

Global Anti-Harassment/Anti-Discrimination

Purpose:

To create and maintain a work environment in which people are treated with dignity, decency and respect.

Applies to:

All CDM Smith entities, its operating groups, subsidiaries, and any affiliated entities, in non-U.S. locations (the Company), where allowed by local law.

Definitions: N/A

Policy:

- I. CDM Smith is committed to providing a work environment free from discrimination, harassment, bullying, and retaliation (victimization), and providing equal employment opportunities for all employees and applicants in accordance with governing laws in the countries in which we operate. All employees will be treated with dignity and respect and receive fair and consistent treatment regardless of where they work. CDM Smith's vision statement and core values affirm that we will be the employer of choice by providing superior opportunities for the best people in the industry. A key goal in supporting our vision is to develop and promote staff diversity and create an environment in which our diverse workforce is valued, nurtured and sustained. Behavior, communication or other conduct that creates an environment that is physically threatening, abusive or offensive based on an individual's personal characteristics and interferes with any employee's ability to perform their job will not be tolerated. An employee's work environment includes business trips and work-related events or social functions. Appropriate communication, conduct and behavior is expected not only of the Company's employees but also of employees of other employers, contractors, members of the public, such as vendors and customers, and third parties such as customers, suppliers, or visitors to our premises.
- II. CDM Smith respects and abides by the laws in all countries in which we operate. All employees are required to understand and adhere to the Company's policies. Policies and approved practices may differ based on the country in which the employee is from and/or working. Information on the Company's policies and guidelines of acceptable behavior, communication

and conduct may be found in our Enterprise Policy Manual and/or our local manuals and handbooks (where applicable). Employees are expected to review and/or seek understanding of the Company's enterprise policies as well as the policies of the locations in which they are from and/or work.

- III. CDM Smith's management is committed to responding and clarifying any concerns and questions, resolving possible violations to policy and making every effort to ensure that CDM Smith's workplace abides by all laws in the countries in which we operate and ensuring the workplace is free from inappropriate and/or illegal behavior, communication and conduct of any kind. To ensure the tenets of this policy are understood and practiced, all employees, except those assigned to an office in the United States, United States territories and Europe, are required to complete Preventing Harassment in a Global Workplace training every two (2) years or as directed, reinforcing how important a safe, inclusive work environment is for our people. If you have any concerns or questions, please review your respective policies and/or contact your direct manager, human resources business partner, the Corporate Employee Relations Manager, any member of management, the Chief Human Resources Officer, the Office of General Counsel or the Chief Compliance Officer (Compliance@cdmsmith.com). You may also make a report via CDM Smith's Compliance and Ethics Integrity Line, a confidential reporting system, at www.cdmsmith.ethicspoint.com.

References: